

AO 91 (Rev. 11/11) Criminal Complaint (approved by AUSA Jasmeet K. Ahuja)

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America)

v.)

VICTOR MANSON)

DANIEL WEARY)

Case No. 19-1080-01

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 8, 2019 in the county of Montgomery in the
Eastern District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 2113(a) & (d)	Bank robbery
18 U.S.C. § 2	Aiding & abetting

This criminal complaint is based on these facts:

Please refer to the attached affidavit.

☒ Continued on the attached sheet.

Faith Greenawalt

Complainant's signature

Faith Greenawalt, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: June 21, 2019City and state: Philadelphia, Pennsylvania

Elizabeth T. Hey

Judge's signature

Honorable Elizabeth T. Hey

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Faith E. Greenawalt, being duly sworn under oath and deposed, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the Philadelphia, Pennsylvania Division, and have been so since July 2013. I am currently assigned to the Violent Crimes Task Force ("VCTF") which investigates violations of Federal law, to include robberies of banks, robberies of businesses that affect interstate commerce (also known as Hobbs Act robberies), kidnappings, and fugitives. Previously, I was assigned to the Counterintelligence squad where I investigated Counter Proliferation, among other violations.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging VICTOR MANSON, date of birth of September 18, 1997, and DANIEL WEARY, date of birth of September 25, 1991, with violations of Title 18, United States Code, Section 2113(a) & (d) (bank robbery and armed bank robbery), and Title 18, United States Code, Section 2(a) (aiding and abetting).

3. The facts in this affidavit are based on my own personal knowledge, my participation in this investigation, discussions with other law enforcement officers and agents directly involved with this investigation, and my review of evidence collected in relation to this investigation. This is intended to show only that there is sufficient probable cause for the requested complaint and warrant and does not set forth all of my knowledge about this matter.

PROBABLE CAUSE

4. On April 8, 2019, at approximately 5:00 p.m., an unknown black male robbed the PNC Bank located at 1316 Bethlehem Pike, Flourtown, Pennsylvania ("PNC Bank"). As discussed below, MANSON and WEARY have admitted to committing this robbery as well as

the April 12 robbery of the Citizens Bank located at 8616 Germantown Avenue, Philadelphia, Pennsylvania.

5. Upon entering PNC Bank, MANSON approached the victim teller, brandished a silver handgun, and demanded money by stating, "Give me all your money." The victim teller complied with MANSON's demands and provided him approximately \$500 in U.S. currency from the emergency transfer station. MANSON placed the money inside a brown purse that he laid on the counter. He then walked to the customer service area and demanded more money. At this point, MANSON was provided additional money as well as a GPS tracking device. MANSON subsequently fled PNC Bank with approximately \$3,184.

6. After the robbery, Springfield Township Police officers and detectives responded to the crime scene for processing. Once on scene, video surveillance footage was recovered. Additionally, responding officers recovered the GPS tracking device in the street, east of the intersection of Bysher Avenue and Bethlehem Pike in Flourtown, Pennsylvania.

7. MANSON was described by the victim teller as a light skinned female, possibly male, thin build, wearing female Muslim clothing and black colored sneakers. MANSON was also described as carrying a brown purse.

8. 3SI Security provided GPS information for the GPS tracking device taken by MANSON. According to 3SI Security's records, MANSON traveled east on W. Wissahickon Avenue. About half a block away from the bank, MANSON ran behind the houses that abutted a Walgreens parking lot. Once in the Walgreens parking lot, he entered a vehicle driven by WEARY. The vehicle then traveled north in the parking lot and exited on Bysher Avenue. The GPS tracking device was then thrown into the street, east of the intersection of Bysher and

Bethlehem Pike, where the last ping was received and where the GPS tracking device was recovered by the Springfield Township Police Department.

9. On Friday, April 12, 2019, at approximately 5:00 p.m., the Citizens Bank located at 8616 Germantown Avenue, Philadelphia, Pennsylvania ("Citizens") also was robbed at gun point by MANSON.

10. MANSON entered Citizens wearing a female Muslim head covering, full sleeve female Muslim dress, and a circle patch on his forehead. He approached the teller counter and stood between two tellers, M.C. and J.B. Although MANSON was initially greeted by J.B., M.C. then approached MANSON and asked if he wanted to make a withdrawal. MANSON replied, "Yes, I'm gonna need y'all to empty your drawer."

11. MANSON then brandished a silver handgun that he pulled partially from a brown purse. M.C. complied with the demands of MANSON and provided approximately \$6,812, which included multiple \$2 bills. MANSON placed the money inside his purse and departed Citizens, traveling eastbound on Germantown Avenue.

12. MANSON was described by the victim teller as an African American male, dark brown complexion, approximately 5'9" in height, very skinny build, and approximately 20-25 years of age. He wore a circle patch on his forehead, believed to cover a tattoo or scar. MANSON was also described as disguising his voice as a female and as wearing a diamond tennis style necklace. MANSON also carried a large women's purse during the robbery.

13. After the robbery, Philadelphia Police Department officers and members of the Philadelphia Division of the VCTF responded to the crime scene for processing. Once on scene, M.C. and J.B. were interviewed and video surveillance footage was recovered.

14. Upon learning of the robbery over police radio, PPD Officer Stephen Mancuso recognized the description of the robber as being similar to the description of a robber in prior bank robberies that recently occurred in the surrounding areas of Montgomery County and in New Jersey: namely, a black male, 21 years of age, approximately 5'9" in height, dressed in female Muslim attire, and armed with a gun.

15. Officer Mancuso was aware, based on information provided by other law enforcement working on related bank robbery investigations, that a white Volkswagen CC sedan, bearing Pennsylvania registration KXA-8289, was involved in the bank robberies in Montgomery County and in New Jersey. Based upon this information, Officer Mancuso contacted the Springfield Township Police Department, Montgomery County, whom provided the license plate reader locations where the Volkswagen was most recently located: 1900 East Mayland Street, Philadelphia, Pennsylvania. The vehicle was registered to an Eddie Weary of 1849 East Nolan Street, Philadelphia, Pennsylvania.

16. Shortly thereafter, notice of the location of the Volkswagen CC sedan was sent to PPD Officers Jennifer Skrocki and Tho LaCourte. The officers arrived at 1900 East Mayland Street, Philadelphia, Pennsylvania, and found WEARY in the vehicle. After the officers spoke briefly with WEARY, he was placed in custody and transported to the Philadelphia Division of the FBI, 600 Arch Street, 8th Floor, Philadelphia, Pennsylvania, for further investigation.

17. PPD Officers David Dohan and Lucas Lesko then arrived at 1900 East Mayland Street, Philadelphia, Pennsylvania, to secure the Volkswagen CC sedan, bearing Pennsylvania registration KXA-8289, while waiting for the vehicle to be impounded.

18. At approximately 9:00 p.m., Officers Dohan and Lesko observed MANSON walking slowly eastbound on the passenger side of their marked police vehicle, and staring at the

white Volkswagen CC sedan. The officers further observed that MANSON continued to walk slowly while he performed an unknown function on his cellular telephone. After MANSON walked east and around the corner, he paused, placed his hands on his head, turned around, and walked back in the direction of the Volkswagen. At this time, the officers noticed MANSON was wearing a diamond tennis style necklace around his neck similar to the one the robber was described as wearing in the April 12, 2019 robbery of Citizens Bank. Officers further noticed that MANSON had a large bulge in his left pants pocket and a tattoo between his eyes.

19. The officers stopped MANSON and asked if he was okay, to which he replied he was. Officers asked MANSON if the white Volkswagen belonged to him, to which MANSON replied that it did not.

20. When asked where he lived, MANSON said, "Just around the corner." MANSON then gave the officers his home address of 1308 E. Upsal Street, which was not physically "around the corner" from where the officers found MANSON. As the officers continued to speak with him, MANSON turned his pocket bulge away from the officers. From this behavior, the officers feared MANSON may be carrying or concealing a firearm. When the officers asked MANSON if he was carrying a gun, MANSON said he was "going to a strip club," and he told the officers it was money inside his pocket.

21. MANSON then gave the officers permission to recover the money from his front pocket. Officers noticed a large billfold, which they found contained \$1, \$2, and \$5 dollar bills. Officers recognized the unusual amount of \$2 dollar bills as consistent with the money stolen during the Citizens Bank robbery. MANSON was detained for further investigation.

22. At the time of the stop, MANSON was unable to provide the officers with identification, explaining as he motioned to a running vehicle up the street—a silver Cadillac

SRX—that his identification was inside the car. MANSON provided Officer Lesko permission to retrieve his identification and told Officer Lesko that his identification was located in the driver's side door. Upon opening the 2004 silver Cadillac SRX, bearing Pennsylvania temporary tag 1846-710 and VIN 1GYDE637740118030, Officer Lesko recovered MANSON's identification, and observed a large billfold of multiple \$100s, \$50s, \$20s, and \$10s in the door. Officer Lesko then secured the vehicle.

23. At approximately 9:30 p.m., FBI Task Force Officer ("TFO") Matthew Carey arrived at 1900 East Maynard Street where he met with PPD Officers Dohan and Lesko. TFO Carey photographed the vehicle and recovered the cash from the Cadillac SRX. In total, approximately \$6,170 (33 x \$100; 36 x \$50; 48 x \$20; 11 x \$10) was recovered from inside the Cadillac SRX. The Cadillac was then towed to Major Crimes Auto Squad for further investigation. Upon a search of the vehicle, after obtaining a search warrant, latex gloves similar to the latex gloves worn in the Citizens robbery were recovered.

24. MANSON was transported to the Philadelphia Division of the FBI, 600 Arch Street, 8th Floor, Philadelphia, Pennsylvania, for further investigation.

25. FBI Special Agent Benjamin Paris counted the money recovered from MANSON's person. The total amount recovered was approximately \$243 (24 x \$5; 17 x \$2; 89 x \$1).

26. Upon arrival at the FBI, MANSON was advised of his rights, via an FBI FD-395, Advice of Rights form, which he subsequently signed and dated. MANSON then provided a full confession to his involvement in a number of bank robberies, including the April 8, 2019 robbery of PNC Bank, 1316 Bethlehem Pike, Flourtown, Pennsylvania; and the April 12, 2019 robbery of Citizens Bank, 8616 Germantown Avenue, Philadelphia, Pennsylvania.

27. Additionally, MANSON admitted that WEARY drove MANSON to and from the April 8, 2019 robbery of PNC Bank. The interview of MANSON was visually and audibly recorded.

28. At the conclusion of the interview, MANSON was shown a Springfield Township Wanted Flyer for the April 8, 2019 robbery of PNC Bank. MANSON identified himself as the individual depicted in the surveillance photographs on the Wanted Flyer and subsequently signed and dated the flyer.

29. At that time, MANSON was arrested by PPD for the April 12, 2019 robbery of Citizens Bank. MANSON is currently being held at Curran-Fromhold Correctional Facility, located in Philadelphia, Pennsylvania.

30. Upon arrival at FBI Philadelphia, WEARY was also advised of his rights, via an FBI FD-395, Advice of Rights form, which he subsequently signed and dated. During his interview, WEARY admitted to his involvement in a number of bank robberies, including the April 8, 2019 robbery of PNC Bank, 1316 Bethlehem Pike, Flourtown, Pennsylvania. WEARY admitted to driving MANSON to and from the April 8 PNC Bank robbery. The interview of WEARY was visually and audibly recorded.


31. At the conclusion of the interview, WEARY was arrested and charged by Springfield Township Police Department for the April 8, 2019 robbery of PNC Bank. WEARY is currently being held at Montgomery County Correctional Facility.

32. Investigators conducted database checks for MANSON and WEARY, to include a criminal history, prior arrests, and a driver's license check, and confirmed MANSON's and WEARY's identities.

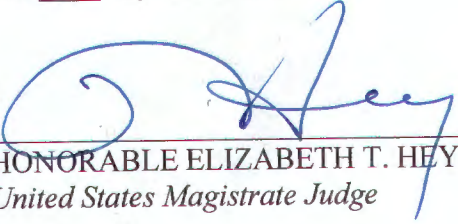
33. Your affiant has compared the physical appearance and description of MANSON with that of the physical description provided by bank employees, and believes MANSON fits the physical descriptions provided by the bank employees at PNC Bank.

34. The deposits of PNC Bank are insured by the Federal Deposit Insurance Corporation ("FDIC") and were insured by the FDIC at the time of the robbery described above.

35. Based on the aforementioned facts, your affiant believes there is probable cause to charge VICTOR MANSON and DANIEL WEARY with the April 8, 2019 robbery of PNC Bank, 1316 Bethlehem Pike, Flourtown, Pennsylvania, in violation of Title 18, United States Code, Section 2113(a) and (d) (bank robbery and armed bank robbery), and Title 18, United States Code, Section 2(a) (aiding and abetting).


FAITH E. GREENAWALT
Special Agent
Federal Bureau of Investigation

Sworn to before me
this 21st day of June, 2019


HONORABLE ELIZABETH T. HEY
United States Magistrate Judge